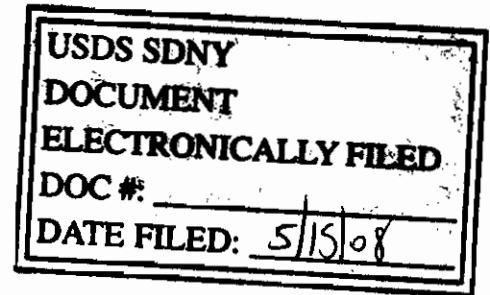


**Thompson Wigdor & Gilly LLP****MEMO ENDORSED****Kate Webber**
kwebber@twglawyers.com

May 14, 2008

VIA FACSIMILE

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl St., Room 640
New York, NY 10007

Re: Arnold Schanfield v. Sojitz Corporation of America, et al., 07-cv-9716

Dear Judge McMahon:

We represent Plaintiff in the above-referenced matter and write to respectfully request an extension of two discovery deadlines, specifically, the deadline for the completion of Plaintiff's deposition and the deadline for the submission of expert disclosures, including reports. Defendants do not object to Plaintiff's request.

The current deadline for Plaintiff's deposition is May 30, 2008; Plaintiff respectfully requests an adjournment of this deadline by three weeks to June 20, 2008. The current deadlines for submission of expert reports are July 31, 2008 for Plaintiff and August 15, 2008 for Defendants; the parties respectfully request an adjournment of these deadlines by four weeks to August 29, 2008 and September 15, 2008, respectively. This would be the second extension of these deadlines, but neither requires an adjournment of the existing October 31, 2008 deadline for the completion of all discovery.

The extensions are requested due to the volume of electronic discovery and the need for collection of data to perform expert statistical analysis in support of Plaintiff's class certification efforts. To date, the parties have moved forward promptly with discovery. Both parties have exchanged thousands of pages of documents, responded to interrogatories, produced medical authorizations and damages-related materials, and have resolved a number of issues among ourselves. Defendants' production, however, totals over 42,000 pages which has been produced on a rolling basis – nearly 27,000 pages arrived on April 25, 2008 and the most recent production arrived May 9, 2008. All of these documents come from Plaintiff's e-mail during his time as an

Thompson Wigdor & Gilly LLP ATTORNEYS AND COUNSELORS AT LAW

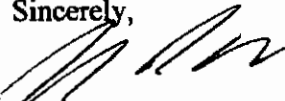
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employee of Defendant Sojitz Corporation of America, and additional time is needed to review these materials prior to Plaintiff's deposition in order to avoid any prejudice to Plaintiff.

With respect to the statistical information needed for Plaintiff's expert report, since our last letter to the Court, through cooperative efforts with Defendants, Plaintiff has obtained additional information concerning where the data is located and in what format it exists. The parties are still negotiating the terms of production of this data. Moreover, Plaintiff has learned that some data may need to be manually entered into a computerized format for analysis, which requires more time. For these reasons, Plaintiff is requesting an additional four weeks for his expert report.

Counsel for both parties continue to confer on almost a weekly basis to advance discovery and are working, in good faith, to move the case forward. Plaintiff therefore respectfully requests an extension of the discovery deadlines as set forth herein.

Sincerely,



Kate Webber

cc: Laura Allen, Esq., Joanne Seltzer, Esq. (counsel for Defendants)